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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES HABER,

Petitioner,

v.

UNITED STATES OF AMERICA and SIGNATURE BANK,

Respondents.

14 Civ. 8325 (LTS) (KNF)

NOTICE OF MOTION FOR PROTECTIVE ORDER

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the Declaration of Linda Y. Thomas, dated December 19, 2014, ECF No. 28, respondent the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, hereby moves this Court, before the Honorable Laura Taylor Swain, United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, for a protective order with respect to Petitioner's First Set of Requests for the Production of Documents and the Notice of Deposition of Revenue Officer Linda Y. Thomas, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure.

Dated: New York, New York
March 16, 2015

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Respondent the United States of America

By: _/s/ Dominika Tarczynska______
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